VORYS, SATER, SEYMOUR AND PEASE LLP

52 East Gay Street

P.O. Box 1008

Columbus, Ohio 43216-1008

Telephone: (614) 464-6400 Facsimile: (614) 464-6450

Robert J. Sidman, Esq. (Ohio-0017390) (pro hac vice motion pending)

rjsidman@vssp.com

Tiffany Strelow Cobb (Ohio-0067516) (pro hac vice motion pending)

tscobb@vssp.com

Attorneys for Honda of America Manufacturing, Inc. and its affiliates The Worthington Steel Company, Worthington Steel of Michigan, Inc., YUSA Corporation, and A. Schulman, Inc.

# IN THE UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:	8	
m re.	8 8	Case No: 05-44481-rdd
	8	
DELPHI CORPORATION, et al.	§	Jointly Administered
	§	
Debtors.	§	
	8	

### VERIFIED STATEMENT PURSUANT TO RULE 2019 OF THE BANKRUPTCY CODE

Vorys, Sater, Seymour and Pease LLP (the "Vorys Firm"), pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure, hereby files this Verified Statement.

1. Name and address of creditors/parties in interest represented:

Honda of America Manufacturing, Inc. and its affiliates The Worthington Steel Company Worthington Steel of Michigan, Inc. YUSA Corporation A. Schulman, Inc.

2. Nature and amount of claim or interest and time of acquisition thereof unless it is alleged to have been acquired more than one year prior to the filing of the petition.

- A. Honda of America Manufacturing, Inc. and its affiliates may be asserting claims in this Chapter 11 case with an amount that has not yet been determined. Counsel has been retained by these creditors to represent it in all matters regarding this Chapter 11 proceeding at its normal and customary hourly rates.
- B. The Worthington Steel Company and Worthington Steel of Michigan, Inc. may be asserting claims in this Chapter 11 case with an amount that has not yet been determined. Counsel has been retained by these creditors to represent it in all matters regarding this Chapter 11 proceeding at its normal and customary hourly rates.
- C. YUSA Corporation of 151 Jamison Road SW, Washington C.H., Ohio 43160 may be asserting a claim(s) in this Chapter 11 case with an amount(s) that has not yet been determined. Counsel has been retained by these creditors to represent it in all matters regarding this Chapter 11 proceeding at its normal and customary hourly rates.
- D. A. Schulman, Inc. may be asserting claims in this Chapter 11 case with an amount that has not yet been determined. Counsel has been retained by this creditor to represent it in all matters regarding this Chapter 11 proceeding at its normal and customary hourly rates.
- 3. A recital of pertinent facts and circumstances in connection with the employment of the entity or entities at whose instance, directly or indirectly, the employment was arranged.

The Vorys Firm has represented each of the above creditors/parties in interest for a number of years on a variety of matters and was asked by each of these related entities to represent each in this Chapter 11 case.

4. With reference to the time of the employment of the entity, the organization or formation of the committee, or the appearance in the case, the amounts of claims or interests owned by the entity, the times when acquired, the amounts paid therefor, and any sales or other

disposition thereof.

This is not applicable to the Vorys Firm.

Respectfully submitted,

By: /s/ Tiffany Strelow Cobb

Robert J. Sidman, Esq. (0017390) Tiffany Strelow Cobb, Esq. (0067516) Vorys, Sater, Seymour, and Pease LLP

52 East Gay Street Columbus, Ohio 43216 Phone: (614) 464-8322 Fax: (614) 719-4663 E-mail: tscobb@vssp.com

#### VERIFICATION

I, Tiffany Strelow Cobb, of the law firm of Vorys, Sater, Seymour, and Pease LLP, declare under penalty of perjury that I have read the foregoing statement and that it is true and correct to the best of my knowledge, information and belief.

			/s/ Tiffany Strelow Cobb
			Tiffany Strelow Cobb
STATE OF OHIO	)	aa	
COUNTY OF FRANKLIN	)	SS.	

SWORN TO AND SUBSCRIBED TO in my presence, this 26<sup>th</sup> of October, 2005.

/s/ Elissa P. Litfin
Notary Public, State of Ohio
My commission expires on March 27, 2008

# **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 26<sup>th</sup> day of October, 2005, a copy of the preceding Verified Rule 2019 Statement was electronically filed through the Court's ECF system and served upon the attached Master Service List by regular U.S. mail and by operation of the Court's electronic filing system. Parties may also access this filing through the Court's system.

/s/ Tiffany Strelow Cobb
Tiffany Strelow Cobb, Esq.

## **MASTER SERVICE LIST**

Delphi Corporation

Attn: Sean Corcoran, Karen Craft

5725 Delphi Drive Troy, MI 48098

Skadden, Arps, Slate Meagher & Flom LLP

Attn: Kayalyn A. Marafioit, Thomas J. Matz

Attorneys for the Debtors Four Times Square

New York, New York 10036

Latham & Watkins LLP Attn: Robert J. Rosenberg

Attorneys for Creditors' Committee 885 Third Avenue, Suite 1000 New York, NY 10022-4834

Davis Polk & Wardwell Attn: Donald Bernstein

Postpetition Administrative Agent

450 Lexington Avenue New York, NY 10017

JP Morgan Chase Bank, N.A. Attn: Clifford Trapani, Khuyen Ta Pre/Postpetition Administrative Agents

1111 Fannin, 10<sup>th</sup> Floor Houston, TX 77002

Capital Research and Management Company

Attn: Michelle Robson

11100 Santa Monica Blvd, 15<sup>th</sup> Floor

Los Angeles, CA 90025

Curtis, Mallet-Prevost, Colt & Mosle LLP

Attn: Steven J. Reisman 101 Park Avenue

New York, NY 10176-0061

Flextronics International Asia-Pacific Ltd. c/o Flextronics International USA Inc.

Attn: Paul W. Anderson 2090 Furtune Drive San Jose, CA 95131

FTI Consulting, Inc. Attn: Randall S. Eisenberg 3 Times Square, 11<sup>th</sup> Floor New York, NY 10036 Skadden, Arps, Slate, Meagher & Flom LLP

Attn: John W. Butler, Jr., John K. Lyons, Ron E.

Meisler

Attorneys for the Debtors 333 West Wacher Drive Chicago, IL 60606

Shearman & Sterling LLP

Attn: Douglas Bartner, Jill Frizzley

Local Counsel to Debtors 599 Lexington Avenue New York, NY 10022

The Office of the U.S. Trustee

Attn: Alicia M. Leonard, Deirdre A. Martin

33 Whitehall Street, 21<sup>st</sup> Floor New York, New York 10004-2111

Simpson Thatcher & Bartlett LLP

Attn: Kenneth S. Ziman, Robert H. Trust, William T.

Russell, Jr.

Prepetition Administrative Agent

425 Lexington Avenue New York, NY 10017

JP Morgan Chase Bank, N.A.

Attn: Gianni Russello, Thomas F. Maher,

Richard Duker, Vilma Francis

Pre/Postpetition Administrative Agents

270 Park Avenue New York, NY 10017

Cohen Weiss & Simon Attn: Bruce Simon 330 W. 42<sup>nd</sup> Street New York, NY 10036

Electronic Data Systems Corp.

Attn: Michael Nefkens 5505 Corporate Drive MSIA

Troy, MI 48098

Freescale Semiconductor, Inc. Attn: Richard Lee Chambers, II 6501 William Cannon Drive West

MD OE16

Austin, TX 78735

General Electric Company Attn: Valerie Venable One Plastics Avenue Pittsfield, MA 01201 General Motors Corporation Attn: John Devine 300 Renaissance Center P.O. Box 300 Detroit, MI 48265

Hodgson Russ LLP Attn: Stephen H. Gross 152 W. 57<sup>th</sup> Street, 35<sup>th</sup> Floor New York, NY 10019

Internal Revenue Service Attn: Insolvency Dept. 477 Michigan Avenue, Mail Stop 15 Detroit, MI 48226

Jeffries & Company, Inc. Attn: William Q. Derrough 520 Madison Avenue, 12<sup>th</sup> Floor New York, NY 10022

Mesirow Financial Attn: Melissa Knolls 321 N. Clark Street, 13<sup>th</sup> Floor Chicago, IL 60601

Office of New York State Attorney General Eliot Spitzer 120 Broadway New York, NY 10271

O'Melveny & Meyer LLP Attn: Tom A. Jerman, Rachel Janger 1625 Eye Street, NW Washington, DC 20006

Philips Nizer LLP Attn: Sandra A. Riemer 666 Fifth Avenue New York, NY 10103

Securities and Exchange Commission Reorganization Branch 233 Broadway New York, NY 10279

Stevens & Lee, PC Attn: Chester B. Salomon, Constantine D. Pourakis 485 Madison Avenue, 20<sup>th</sup> Floor New York, NY 10022

Wilmington Trust Company Attn: Steven M. Cimalore Rodney Square North 1100 North Market Street Wilmington, DE 19890 Groom Law Group Attn: Lonie A. Hasse 1701 Pennsylvania Avenue, NW Washington, DC 20006

Internal Revenue Service Attn: Insolvency Dept. 290 Broadway, 5<sup>th</sup> Floor New York, NY 10007

IUE-CWA Attn: Hunry Reichard 2360 W. Dorothy Lane, Suite 201 Dayton, OH 45439

Kurtzman Carson Consultants Attn: James Le 12910 Culver Blvd, Suite 1 Los Angeles, CA 90066

Morrison Cohen LLP Attn: Joseph T. Moldovan 909 Third Avenue New York, NY 10022

O'Melveny & Meyer LLP Attn: Robert Seigel 400 South Hope Street Los Angeles, CA 90071

Pension Benefit Guaranty Corp. Attn: Jeffrey Cohen, Ralph L. Landy 1200 K Street, NW, Suite 340 Washington, DC 20005

Rothchild Inc. Attn: David L. Resnick 1251 Avenue of the Americas New York, NY 10020

Seyfarth Shaw LLP Attn: Robert W. Dremluk 1270 Avenue of the Americas, Suite 2500 New York, NY 10020-1801

Togut, Segal & Segal LLP Attn: Albert Togut One Penn Plaza, Suite 3335 New York, NY 10119